

IN THE UNITED STATES DISTRICT COURT FOR  
THE WESTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

-v-

25-MC- 6006

\$564,294.41 UNITED STATES CURRENCY, et al.,

Defendants.

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**STIPULATION TO EXTEND PLAINTIFF'S TIME  
TO FILE COMPLAINT IN CIVIL FORFEITURE ACTION**

**IT IS HEREBY STIPULATED** and agreed upon between and among the United States of America by its attorney, Michael DiGiacomo, United States Attorney for the Western District of New York, Mary Clare Kane, Assistant United States Attorney, of counsel, and James D. Doyle, Esq., counsel for claimants Salahaldden Ali, Hamam Ali, Mohammed Ahmed, and their associated businesses (hereinafter "claimants"), that pursuant to Title 18, United States Code, Section 983(a)(3)(A), the government's time to file a Verified Complaint for Forfeiture as to assets listed in Exhibit A, attached hereto, is extended **from June 22, 2025 to October 20, 2025**.

The government further acknowledges that all administrative claims, filed with the DEA in the administrative proceedings filed on behalf of claimants by James D. Doyle, Esq., counsel for claimants, received by the U.S. Attorney's Office as of the date of this stipulation, are accepted without exception including but not limited to matters of timeliness and form.

The parties to this Stipulation further agree that claimants may revoke their consent to this extension; and that in the event of such a revocation, then the government shall have twenty (20) days from the date the government received written notice of such action to file its Verified Complaint for Forfeiture.

A party's electronic signature and/or e-mailed signature of this Stipulation will be valid and sufficient to bind any such party to this Stipulation and will have the same force and effect as an original signature.

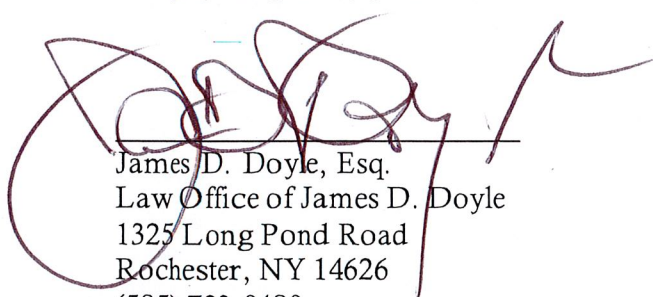
DATED: Rochester, New York, June , 2025.

MICHAEL DIGIACOMO  
United States Attorney

Dated: 6/17/25

Mary Clare Kane  
Assistant United States Attorney  
United States Attorney's Office  
Western District of New York  
138 Delaware Avenue  
Buffalo, New York 14202  
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Dated: 6-16-25



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Attorney for Ali Salahaldden,  
Hamam Ali, and Mohammed  
Ahmed

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**EXHIBIT A**

\$564,294.41 UNITED STATES CURRENCY  
\$34,771.00 UNITED STATES CURRENCY,  
\$4,167.00 UNITED STATES CURRENCY,  
\$3,379.09 UNITED STATES CURRENCY,  
\$13,308.25 UNITED STATES CURRENCY  
\$5,965.00 UNITED STATES CURRENCY,  
\$4,557.00 UNITED STATES CURRENCY,  
\$4,216.00 UNITED STATES CURRENCY  
\$17,757.00 UNITED STATES CURRENCY,  
\$15,953.00 UNITED STATES CURRENCY,

ESL FEDERAL CREDIT UNION BANK ACCOUNT #: 1384268999, WITH  
A BALANCE OF \$152,182.24,

ESL FEDERAL CREDIT UNION BANK ACCOUNT #: 1382999850, WITH  
A BALANCE OF \$64,911.48,

ESL FEDERAL CREDIT UNION BANK ACCOUNT #: 1385627680, WITH  
A BALANCE OF \$50,289.92,

ESL FEDERAL CREDIT UNION BANK ACCOUNT #: 1387409889, WITH  
A BALANCE OF \$12,899.77,

ESL FEDERAL CREDIT UNION BANK ACCOUNT #: 1386938664, WITH  
A BALANCE OF \$42,574.22,

ESL FEDERAL CREDIT UNION BANK ACCOUNT #: 1378231938, WITH  
A BALANCE OF \$12,983.89,

ESL FEDERAL CREDIT UNION BANK ACCOUNT #: 1378231946, WITH  
A BALANCE OF \$48,050.04,

ESL FEDERAL CREDIT UNION BANK ACCOUNT #: 1387410663, WITH  
A BALANCE OF \$50,202.61,

ESL FEDERAL CREDIT UNION BANK ACCOUNT #: 1384654065,  
WITH A BALANCE OF \$4,311.21,

ESL FEDERAL CREDIT UNION BANK ACCOUNT #: 1384363816,  
WITH A BALANCE OF \$3,733.44,

ESL FEDERAL CREDIT UNION BANK ACCOUNT #: 1384269336,  
WITH A BALANCE OF \$31,002.99,

ESL FEDERAL CREDIT UNION BANK ACCOUNT #: 1378668733, WITH  
A BALANCE OF \$1,000.36,

ESL FEDERAL CREDIT UNION BANK ACCOUNT #: 1378668741, WITH  
A BALANCE OF \$6,937.69,

ESL FEDERAL CREDIT UNION BANK ACCOUNT #: 1387756875, WITH  
A BALANCE OF \$42,065.52.